

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	CASE NO. 10-40836
	§	
DENTON LONE OAK HOLDINGS, L.P.,	§	
A/K/A HOLIDAY INN & SUITES DENTON	§	
	§	CHAPTER 11
Debtor.	§	

**MOTION FOR EXTENSION OF EXCLUSIVITY PERIOD
PURSUANT TO 11 U.S.C. §1121 AND BRIEF IN SUPPORT**

**TO THE HONORABLE BRENDA T. RHOADES,
UNITED STATES BANKRUPTCY JUDGE:**

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE.

IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT.

IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR RESPONSE MAY BE STRICKEN, THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

COMES NOW, Denton Lone Oak Holdings, L.P. (the “Debtor”), Debtor herein, and files this, its Motion to For Extension of Exclusivity Period Pursuant to 11 U.S.C. §1121 and Brief in Support (the “Motion”), and shows as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A), (B) and (O).
2. Venue in this Court is proper under 28 U.S.C. §§1408 and 1409.

II. BACKGROUND

3. On March 15, 2010 (the “Petition Date”), the Debtor filed its voluntary petition for relief (the “Case”) under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”).

4. Since the Petition Date, the Debtor has continued to operate and manage its business as a debtor in possession pursuant to Bankruptcy Code §§1107(a) and 1108.

5. The Debtor filed its First Amended Disclosure Statement [Docket No. 117] (“Disclosure Statement”) and First Amended Plan of Reorganization [Docket No. 118] (the “Plan”) on July 21, 2010.

6. At the hearing on July 22, 2010, the Court approved the Disclosure Statement. The Confirmation Hearing on the Plan is currently scheduled outside the exclusivity period, on September 16, 2010 at 9:30 a.m. (the “Confirmation Hearing”).

III. REQUEST FOR RELIEF

7. By this motion, the Debtor respectfully requests the entry of an order pursuant to Bankruptcy Code § 1121(d) granting an extension of the exclusive period for acceptance of a plan until the date and time of the Confirmation Hearing.

IV. BRIEF IN SUPPORT

8. Bankruptcy Code § 1121 provides in relevant part that “the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section”. 11 U.S.C. 1121. Cause exists for the relief requested in this Motion as the Debtor has made good faith progress towards reorganization.

9. The 120-day period ran on July 13, 2010 and the Debtor filed the Plan well in advance on June 7, 2010. The Court approved the Disclosure Statement thereafter on July 22, 2010. The corresponding 180-day exclusivity period runs on September 10, 2010 and the Confirmation Hearing is set on September 16, 2010, six days following the expiration of exclusivity. The Debtor requests that the Court enter an order granting an extension of the Debtor's exclusive period to file a chapter 11 plan until the date and time of the Confirmation Hearing.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that the Court enter an order granting the relief sought herein and for such other relief as may be appropriate.

Respectfully submitted,

HIERSCHE, HAYWARD, DRAKELEY & URBACH, P.C.

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**ATTORNEYS FOR DENTON LONE OAK
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CERTIFICATE OF SERVICE

This is to certify that on July 27, 2010, a true and correct copy of the foregoing document was served *via* ECF and/or by first class United States mail to the parties on the attached Master Service List (as of 7.01.10).

/s/ Russell W. Mills
Russell W. Mills